

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010.

Date certified: March 14, 2011

Name of company covered by this certification: DomainsBot, Inc.

Form 499 Filer ID: 828510

Name of signatory: Emiliano Pasqualetti

Title of signatory: CEO

I, Emiliano Pasqualetti, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



DOMAINSBOT, INC.
STATEMENT OF CPNI COMPLIANCE PROCEDURES

DomainsBot, Inc. ("DomainsBot") maintains CPNI in the following databases and record systems: billing system and accounting system. Each of these systems is protected against unauthorized access by log-in and password procedures.

DomainsBot has established operating procedures whereby personnel who are authorized to access CPNI are trained in the authorized uses of this information. All DomainsBot employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by DomainsBot. Pursuant to these procedures, any employee who violates the authorized procedures for access to this information is subject to discipline, up to and including termination of employment.

Since DomainsBot does not engage in any marketing activities where customer approval would be required, DomainsBot does not maintain a database of opt-out approvals at this time. As DomainsBot only commenced limited U.S. operations late in 2010, DomainsBot has very few customers and does limited marketing at this time.

DomainsBot does not share CPNI with any joint venture partner or independent contractor, except as permitted by Commission rules. If DomainsBot were to share CPNI with any joint venture partner or independent contractor, DomainsBot would first establish an opt-in approval procedure.

DomainsBot has established operating procedures to maintain a record of all sales and marketing campaigns that use CPNI. Pursuant to these procedures, the records must be maintained by the C.E.O or his designate, and must be maintained for at least one year. At this time, DomainsBot does not engage in any sales and marketing campaigns that use CPNI.

DomainsBot has established operating procedures for supervisory review of all outbound marketing activities to ensure compliance with the FCC's rules governing CPNI. Pursuant to these procedures, approval of the C.E.O. is required prior to any use of CPNI for marketing activities. As indicated above, DomainsBot does not currently use CPNI in any marketing.

In accordance with the CPNI rules, upon obtaining a customer's oral authorization, customer service representatives of DomainsBot may access a customer's CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each such DomainsBot representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

DomainsBot may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of DomainsBot, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

DomainsBot has established procedures to require a password prior to disclosing call detail information or other CPNI to a customer during a customer-initiated call. DomainsBot does not provide online account access to CPNI. DomainsBot will also provide call detail information to a customer by mailing such information to the address of record or calling the telephone number of record upon customer request if the customer is unable to present a proper password.

DomainsBot has procedures for customer establishment of a password without the use of readily available biographical information or account information. DomainsBot also has procedures for notifying the customer whenever a password, customer response to a back-up means of notification, or address of record is created or changed.

DomainsBot has established procedures for notifying the United States Secret Service and the Federal Bureau of



Investigation in the event of a breach of CPNI protection within seven days of reasonably determining that there has been a breach. Customer notification shall be delayed for a minimum of seven full business days after notification to the USSS and the FBI. DomainsBot has established procedures for maintaining records of such breaches for a minimum of two years.

In the event DomainsBot uses opt-out approval procedures, DomainsBot will utilize procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures would ensure that the notice will be in the form of a letter, and will include: (i) DomainsBot's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether DomainsBot has taken any action; (vii) a copy of the notice provided to customers; and (viii) contact information. DomainsBot would submit the above letter even if it offers other methods by which its customers may opt-out.

